IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

CIRCUIT VENTURES LLC,	§ §	
Plaintiff,	§ §	Case No: 6:20-cv-15
vs.	§ §	
SCHNEIDER ELECTRIC USA, INC.	§ §	JURY TRIAL DEMANDED
Defendant.	§ § §	

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Circuit Ventures LLC ("Plaintiff" or "CV"), by and through its attorneys, files this Original Complaint against Schneider Electric USA, Inc. ("Defendant" or "Schneider") for infringement of United States Patent Nos. 7,256,683 ("the '683 Patent"); 7,834,744 ("the '744 Patent"); 8,816,869 ("the '869 Patent"); and 8,912,893 ("the '893 Patent").

PARTIES AND JURISDICTION

1.   This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2.   Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3.   Plaintiff is a Delaware LLC, with an office address of 825 Watters Creek Blvd., Building M, Suite 250, Allen, TX 75013.

4.   Upon information and belief, Defendant is a Delaware corporation with a principal address of 200 N Martingdale Rd., Ste. 1000, Schaumburg, IL 60173 and may be

served through its registered agent, Corporation Service Company at 211 E. 7th St., Ste. 620, Austin, TX 78701. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

5.   Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

6.   On information and belief, venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District at 1601 Northwestern Dr., El Paso, TX 79912.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 7,256,683)

7.   Plaintiff incorporates paragraphs 1 through 6 herein by reference.

8.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

9.   Plaintiff is the owner by assignment of the '683 Patent with sole rights to enforce the '683 patent and sue infringers.

10.   A copy of the '683 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit A.

11.   The '683 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

12.   The claims of the '683 Patent recite a flexible system that can reproduce the function of a typical security management system. '683 Patent, 3:14-16. Typical systems are proprietary and components from one system will not work with components from another

system. Additionally, any modifications to the hardware or software of a typical system usually

must be done by the original manufacturer. *Id*., 1:16-24. Further, each manufacturer of typical

security management system equipment specifies a particular value of field resistance for the last

field device in a line of devices. *Id*., 2:5-7. The problems with typical systems are especially

apparent when an owner needs to upgrade or modify their system. *Id*., 2:26-38.

> Because each line connected to the system includes a field resistor of a particular value, the owner is forced to return to the original supplier of the SMS in order to provide an upgrade. Alternatively, the system owner must rewire each of the lines connected to the system and replace the field resistor with a different value, as specified by the supplier of the new SMS control unit. Where the resistor is built into the field device it cannot be changed and the system owner is forced to also replace each of the devices if it wants to change to a different brand of SMS control unit.

Id., 2:27-38. And, typical systems include an operator interface which is proprietary and cannot

be changed by the user. *Id*., 2:38-45. The system claimed in the '683 Patent allows for the

retrofit of existing security management systems while using the existing circuity wiring of the

typical legacy system. *Id*., 4:9-16.

13.   Claim 8, for example, recites:

> Apparatus for monitoring the status of a measurable parameter of an electrical circuit, the apparatus comprising:
>
> measurement means for measuring the magnitude of said parameter and generating an analog signal representative of said magnitude;
>
> analog to digital conversion means for generating from said analog signal a count value representative of said magnitude;
>
> comparison means for comparing said count value with a threshold value and generating from the comparison a status signal, said status signal having two possible values which thereby indicates whether the count value is greater than or less than said threshold value;
>
> transmission means for transmitting said status signal via a communications network to a display; and

display means for displaying an indication of said assigned status.

'683 Patent, 9:48-64.

14.   The components recited in the claims (such as in claim 8 for example) are configured, such that they operate in a non-conventional manner.

15.   The components recited in the claims (such as in claim 8 for example) are configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit).   Generic processors cannot provide this functionality. As stated in the specification, "[t]he various threshold values . . . are preferably configured as variables which may be set as parameters of the EOL module. In this way, the EOL module may be configured to operate with a wide range of field resistors, thus enabling the EOL module to be retrofitted to a wide range of field circuits wherein the series and field resistors . . . already exist and cannot readily be changed." '683 Patent, 7:1-8; see also *Id*., 7:19-39 and 7:41-53.

> Such . . . systems using EOL modules according to the present invention may be readily retrofitted to existing system, while utilizing the existing wiring regardless of existing resistance values. A system built in this way, either as an original installation or as a retrofit, provides a flexible and relatively inexpensive option which eliminates dependency on proprietary hardware and software.

Id., 8:27-34.   Thus, the '683 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.
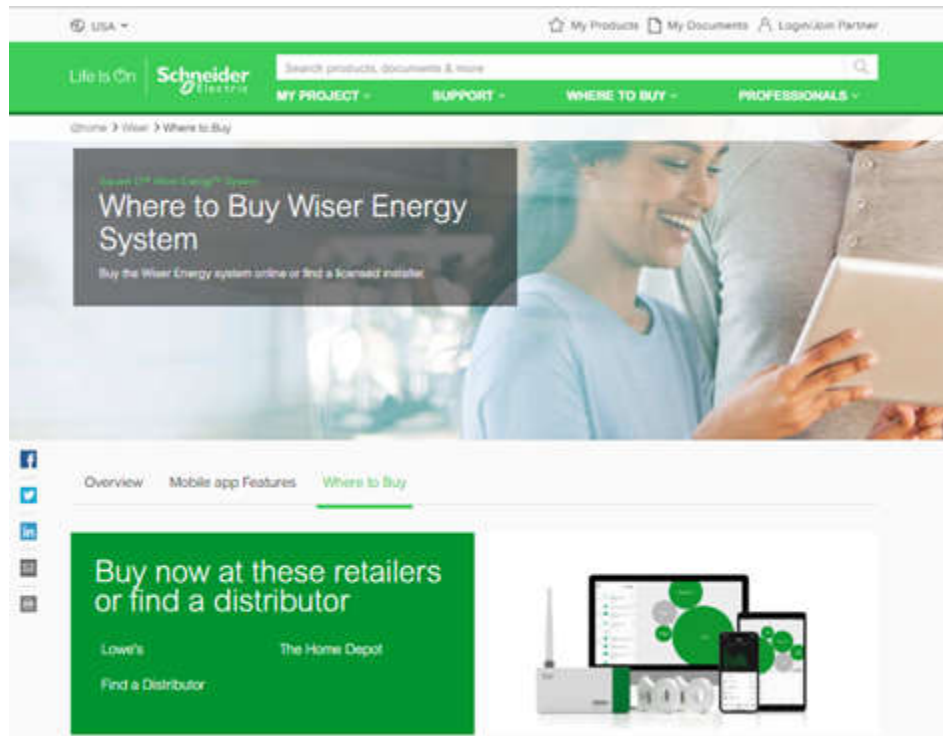
16.   Collectively, the claimed embodiments in the '683 Patent provide new solutions to problems of traditional security monitoring systems.   These solutions are enabled by non-generic components functioning in a non-conventional manner.

17.   The '683 Patent solves a problem with the art that is rooted in computer technology. The '683 Patent does not merely recite the performance of some business practice
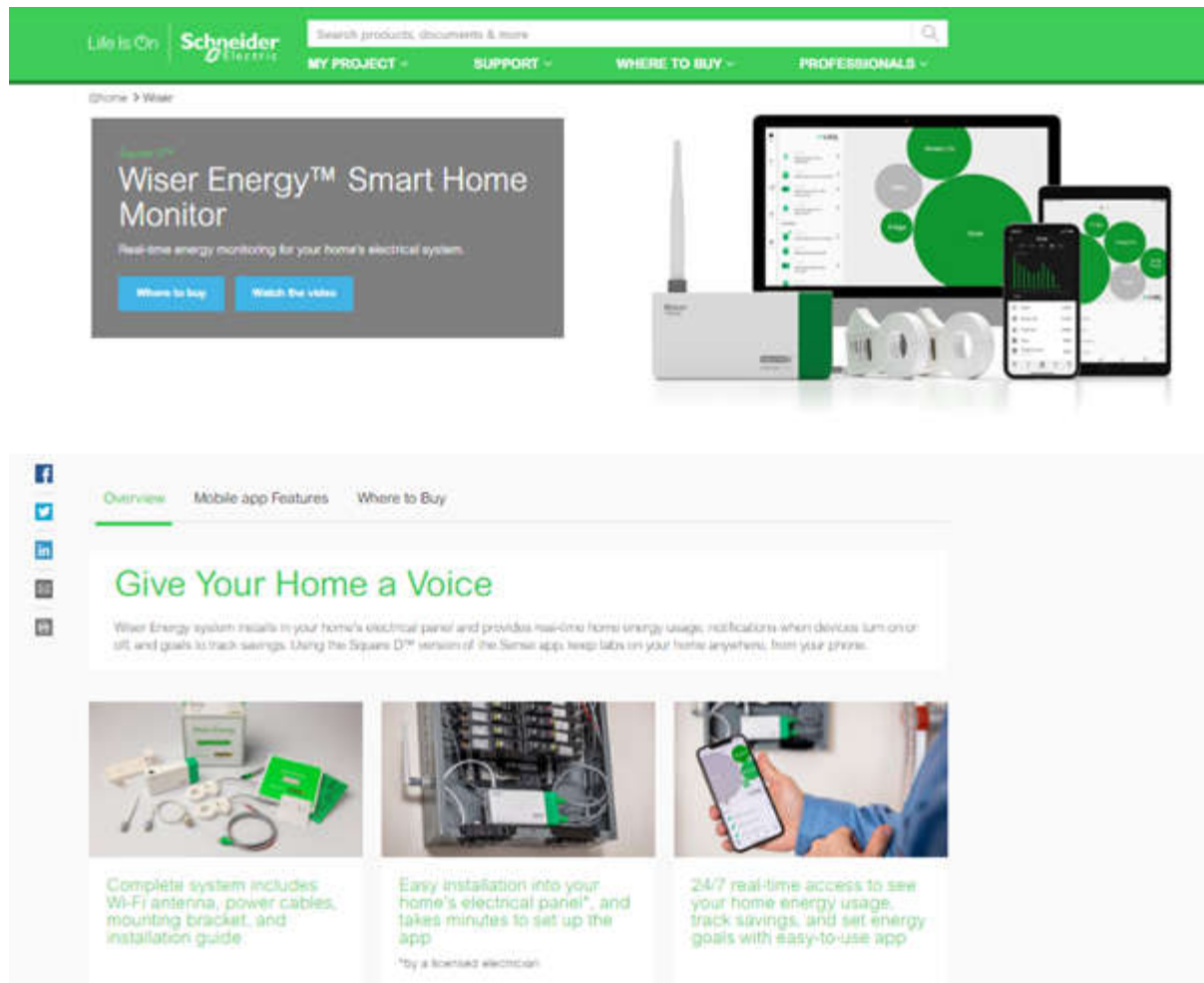
known from the pre-Internet world along with the requirement to perform it on the Internet.

18.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 8 of the '683 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems, which are covered by one or more claims of the '683 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed and continues to infringe the '683 Patent directly in violation of 35 U.S.C. § 271.

19.   Regarding Claim 8, Defendant makes, uses, sells and/or offers for sale an apparatus for monitoring the status of a measurable parameter of an electrical circuit. For example, Schneider Electric provides Wiser Energy System comprising a current sensor, antenna, monitor and Sense mobile application ("Sense Home Energy Monitor") which performs a real-time energy monitoring of residential electrical system. A monitor is used for monitoring a measurable parameter (such as current and/or voltage) of an electrical circuit associated with the sensor. Infringing products and certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

Source: https://www.se.com/us/en/home/smart-home/wiser/buy-wiser/

Source: https://www.se.com/us/en/home/smart-home/wiser/

Source: https://download.schneider-electric.com/files?p_enDocType=Handout&p_File_Name=0102HO1809.pdf&p_Doc_Ref=0102HO1809

Product data sheet
Characteristics

WISEREM
Wiser Energy Home Monitoring

Product availability : Stock - Normally stocked in distribution facility

SQUARE D
by Schneider Electric

Price** : 376.34 USD

Main

Range of product	Wiser
Product or component type	Monitoring unit

Complementary

Height	66.04 mm (2.6 in)
Width	137.16 mm (5.4 in)
Depth	33.02 mm (1.3 in)

Environment

IP degree of protection	IPx0

Ordering and shipping details

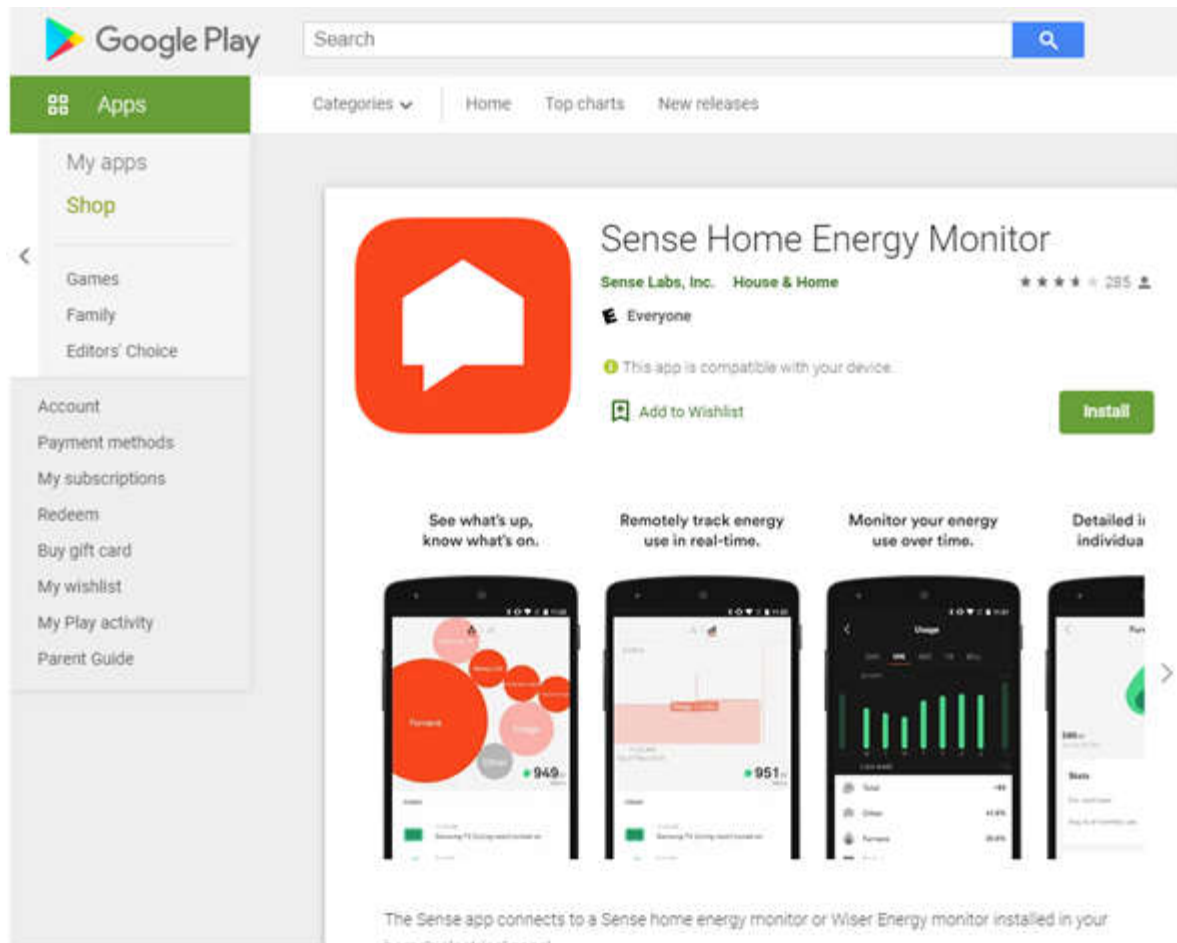| Category	00105 - WISER ENERGY PRODUCTS
Discount Schedule	DE3A
GTIN	00785901218104
Package weight(Lbs)	0.82 kg (1.81 lb(US))
Returnability	Yes
Country of origin	MX

Source: https://www.se.com/us/en/product/download-pdf/WISEREM
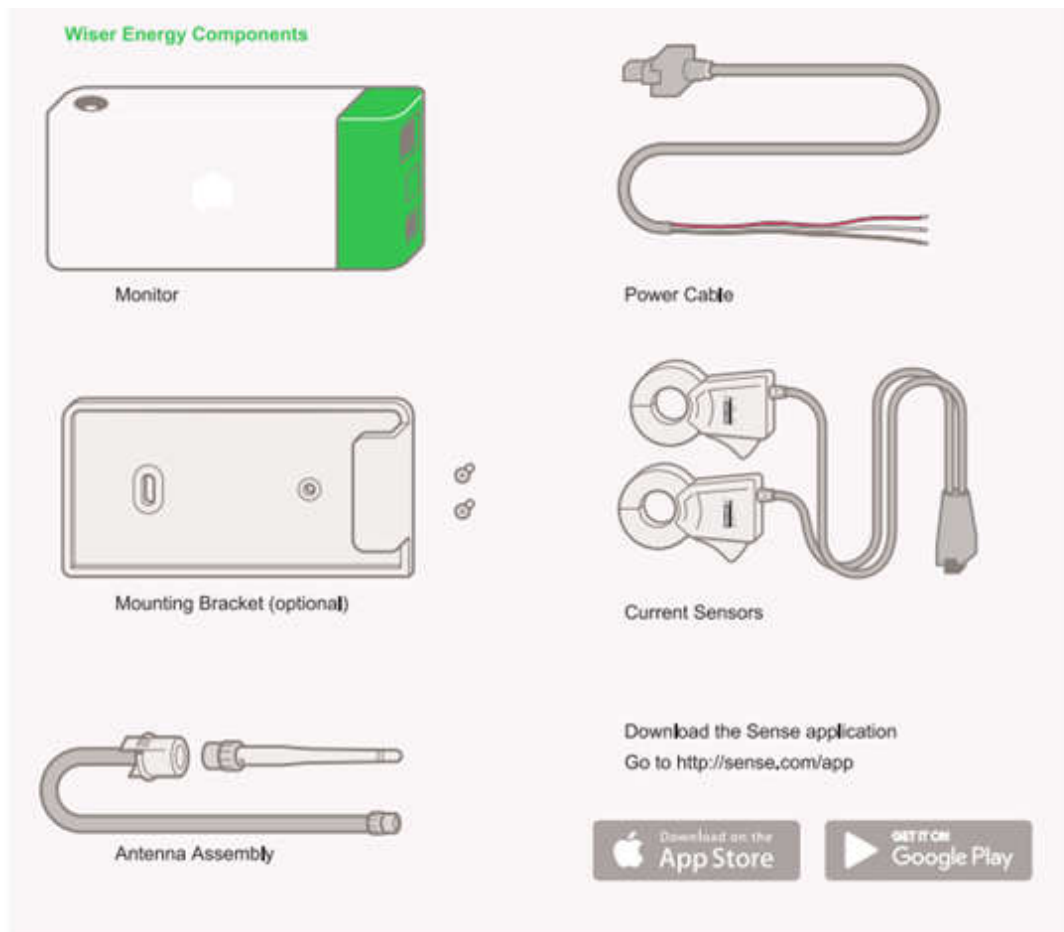
Source: https://download.schneider-electric.com/files?p_enDocType=Instruction+sheet&p_File_Name=Wiser+Energy+Standard+Instruction+Bulletin.pdf&p_Doc_Ref=MFR39166_Standard_Wiser
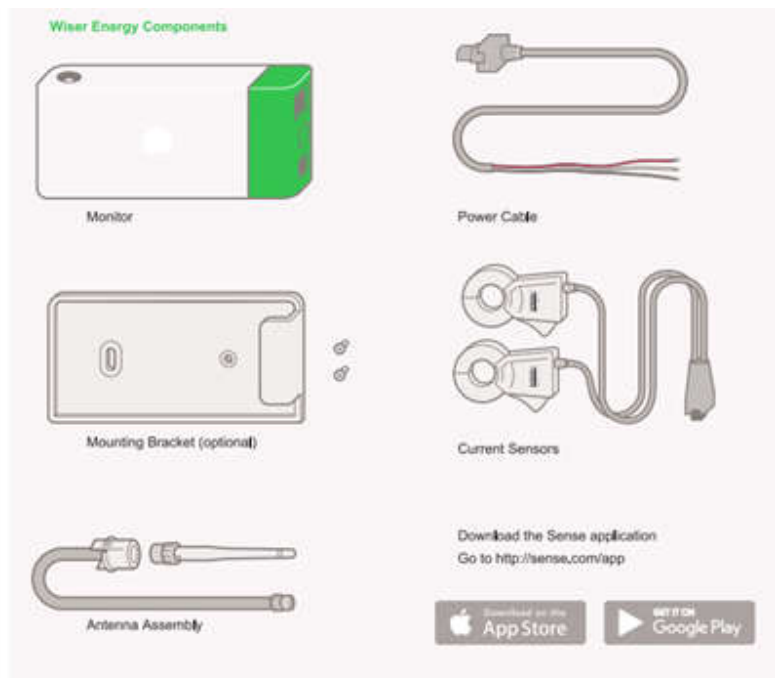
Source: https://apps.apple.com/us/app/sense-home-energy-monitor/id1024626982?mt=8&ign-mpt=uo%3I

Source: https://play.google.com/store/apps/details?id=com.sense.androidclient
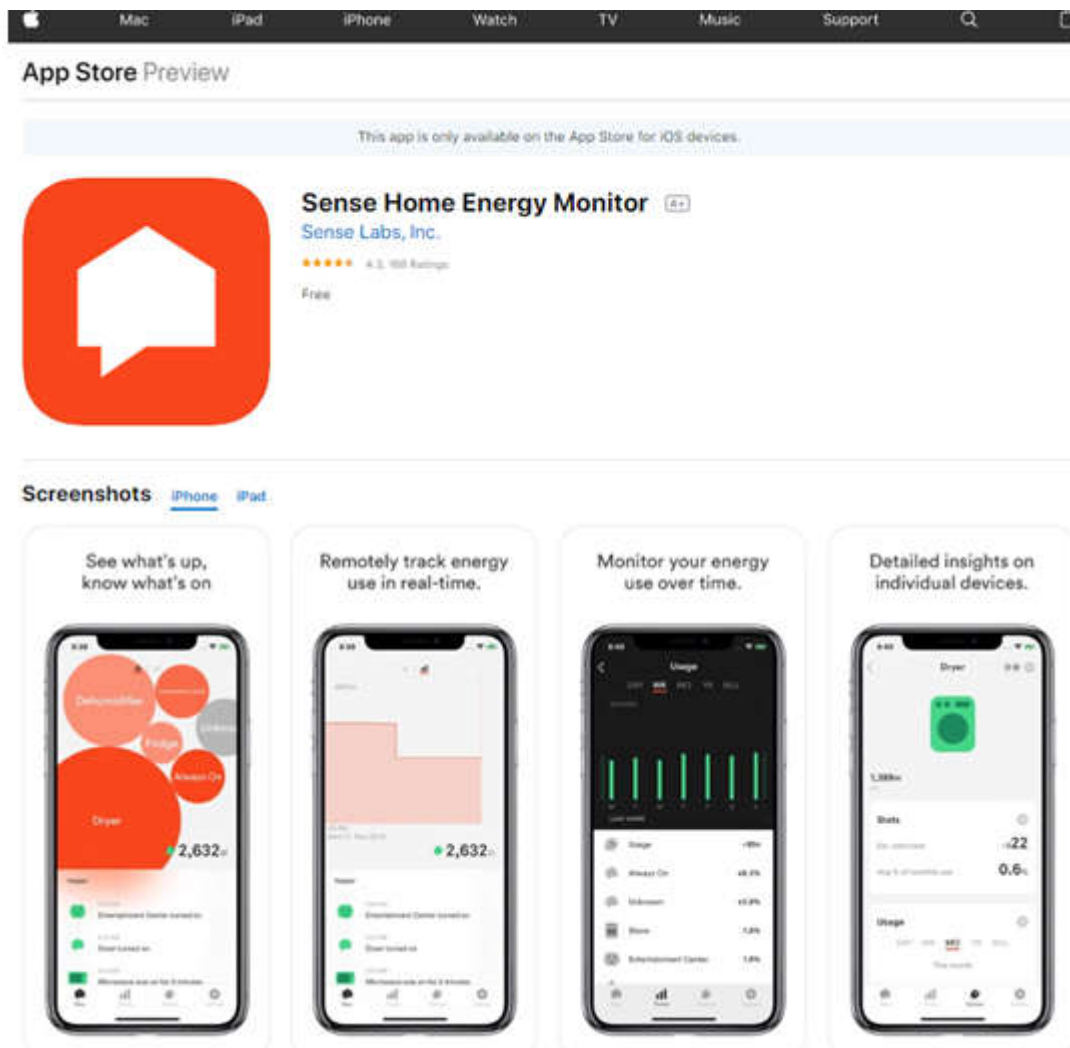
20.   The infringing products provide a measurement means for measuring the magnitude of said parameter and generating an analog signal representative of said magnitude. For example, the monitor integrates with at least one of the sensor ("measurement means") such as current sensor to measure the magnitude of the parameter (such as voltage and/or current) of the circuit and generates an analog signal representative of the measured parameter associated with the sensor. Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

Wiser Energy Components

Monitor

Power Cable

Mounting Bracket (optional)

Current Sensors

Antenna Assembly

Download the Sense application
Go to http://sense.com/app

App Store

Google Play

Source: https://download.schneider-electric.com/files?p_enDocType=Instruction+sheet&p_File_Name=Wiser+Energy+Standard+Instruction+Bulletin.pdf&p_Doc_Ref=MFR39166_Standard_Wiser
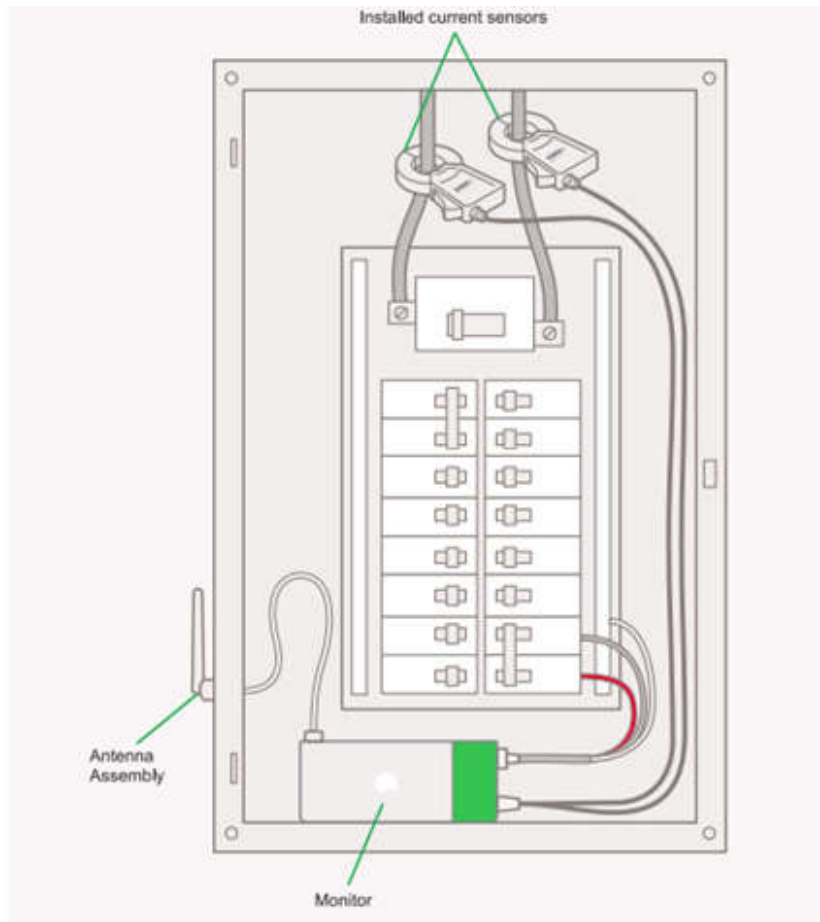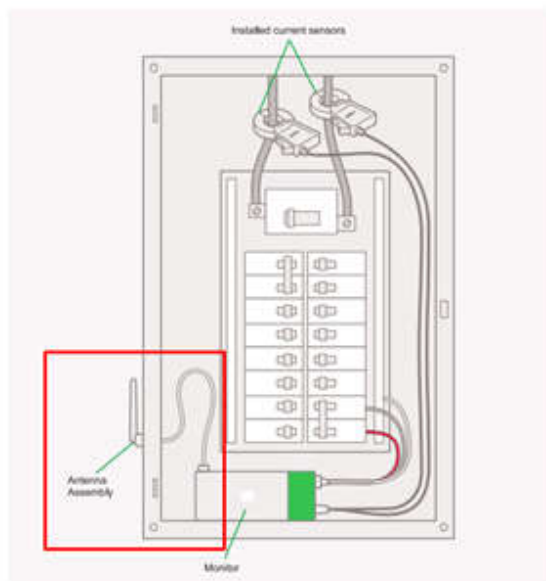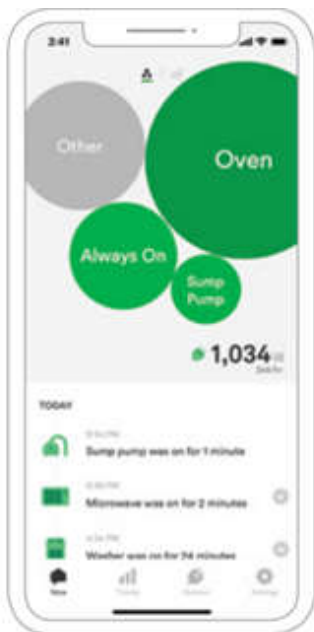
Source: https://download.schneider-electric.com/files?p_enDocType=Instruction+sheet&p_File_Name=Wiser+Energy+Standard+Instruction+Bulletin.pdf&p_Doc_Ref=MFR39166_Standard_Wiser, Page 3

21.   The infringing products provide an analog to digital conversion means for generating from said analog signal a count value representative of said magnitude. For example, Wiser Energy System includes an analog to digital converter to generate a count value associated with the analog signal (such as voltage and/or current) representative of the measured parameter of the sensor. The analog signal is converted to digital signal in order to transmit the signal over a Wi-Fi network. Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.
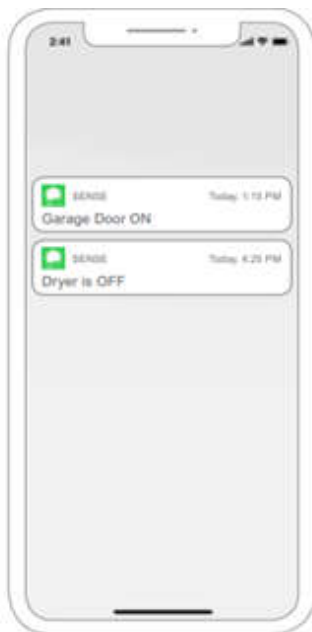
Source: https://download.schneider-electric.com/files?p_enDocType=Instruction+sheet&p_File_Name=Wiser+Energy+Standard+Instruction+Bulletin.pdf&p_Doc_Ref=MFR39166_Standard_Wiser_, Page 3
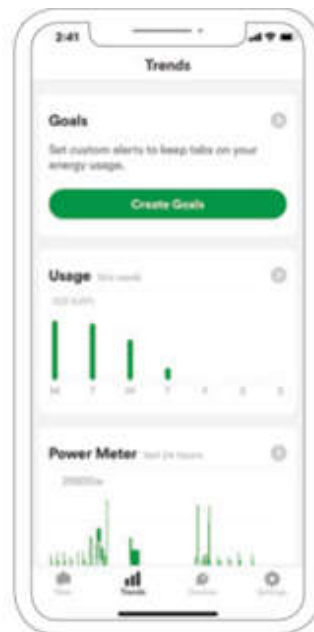
24/7 access

See what's on in your home at any time, from anywhere. With 24/7 access to your home, you can turn your appliances into smart appliances at once.

Notifications

Create custom notifications, letting you know when things turn on/off. Like when your garage door opens, when your dryer turns off, or if you leave a curling iron plugged in.
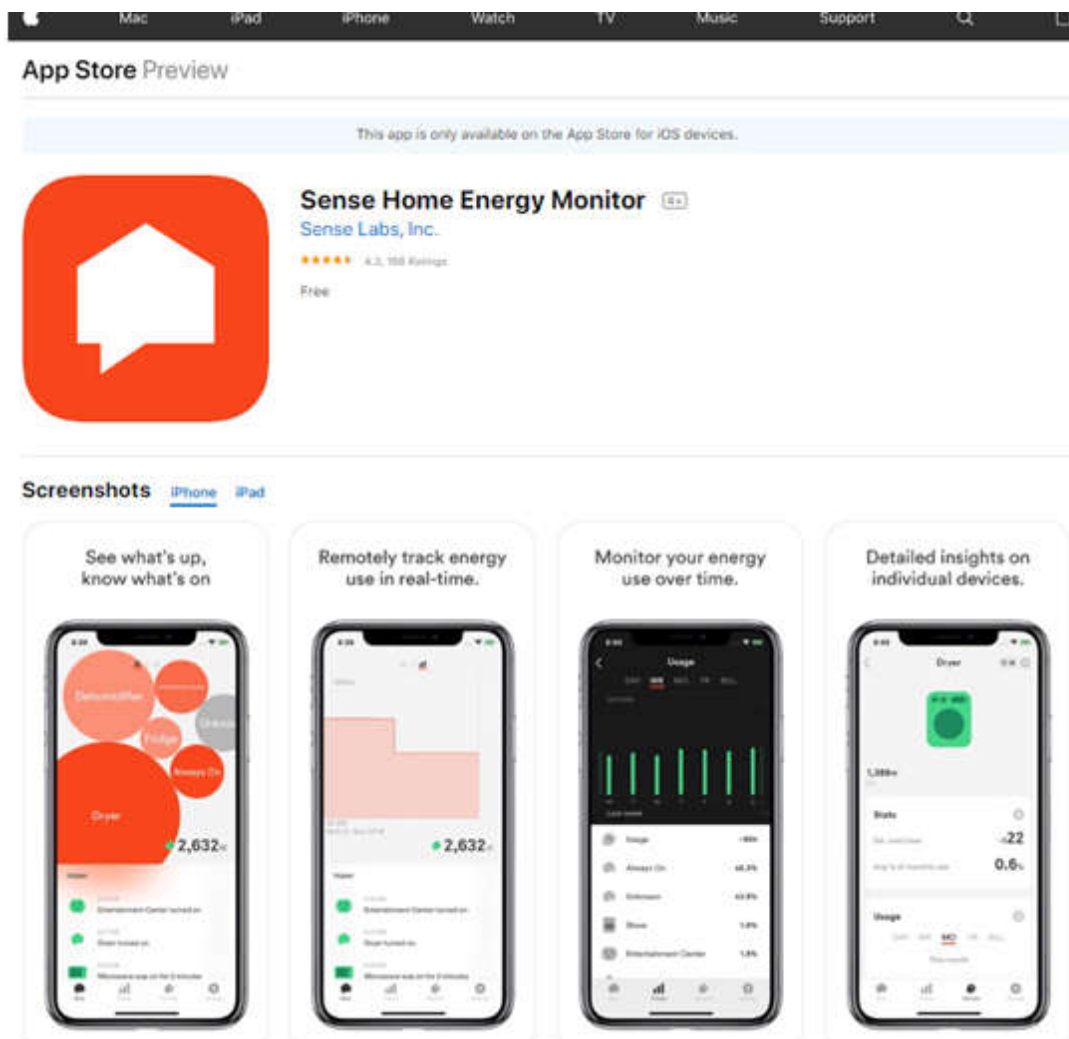
Customize

Set energy usage goals, estimate your monthly energy bills, and take proactive action to cut down on your energy waste. If your home is solar equipped, you can view solar generation, and monitor your return on investment.
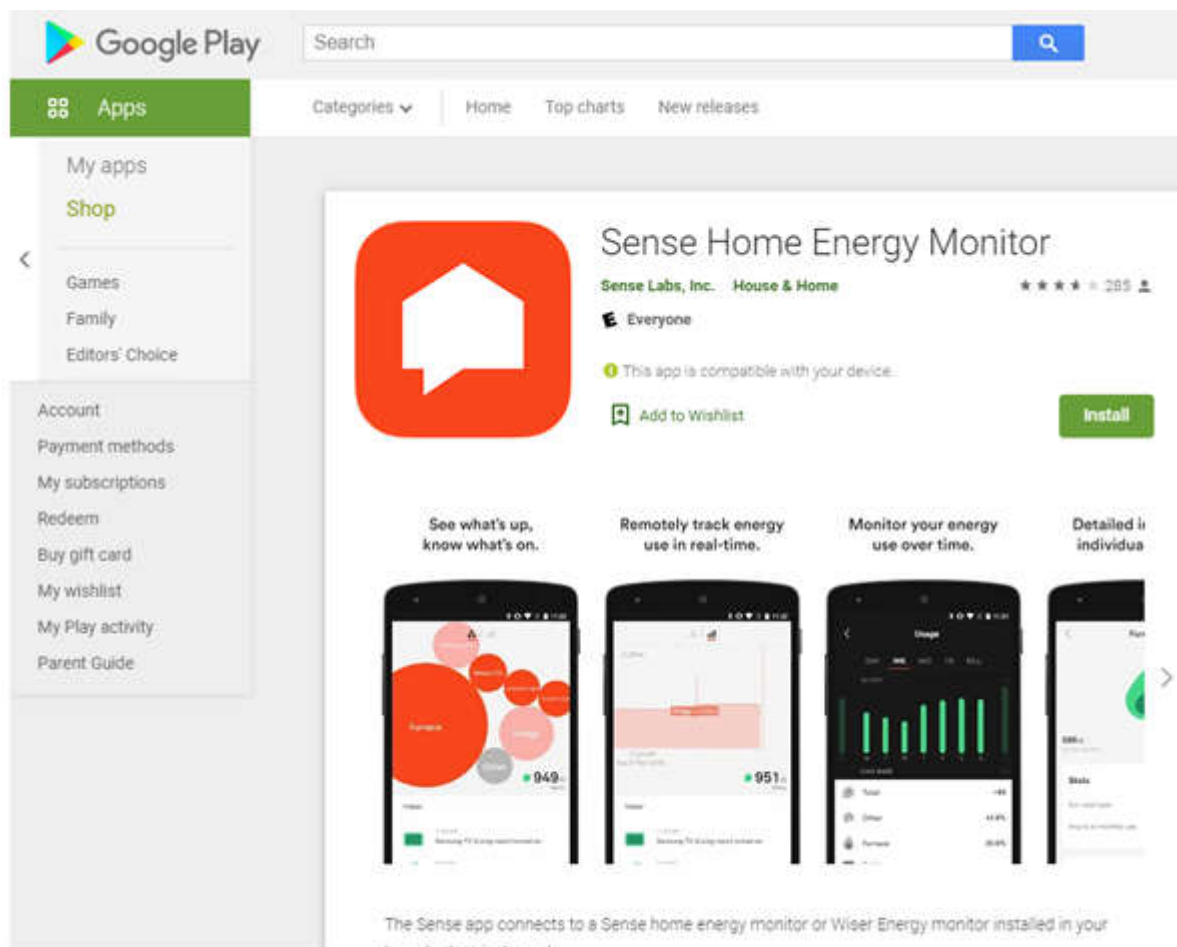
Source: https://download.schneider-electric.com/files?p_enDocType=Brochure&p_File_Name=0102BR1901.pdf&p_Doc_Ref=0102BR1901 , Page 7

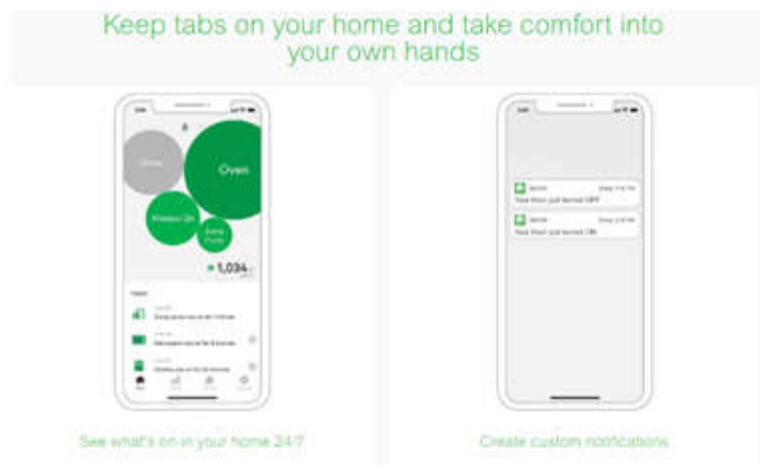| Catalog Number		WISEREM	WISEREMPV	WISERCTPV
Technical Description		Wiser Energy Disaggregation Monitoring	Wiser Energy Solar Disaggregation Monitoring	Wiser Energy Solar CT Kit
Compatibility		120VAC (90V-130V), 60Hz 120V split-phase service		
		Suitable for indoor or outdoor rated panels		
Current Transformers	CT Specs	CAT III 300V 200A max		
	CT Type	Split-core		
	Cable Length	46"		
	Inside Diameter	1"		
Wireless	Wifi	802.11b/g/n Wi-Fi		N/A
	Bluetooth	Y		N/A
	Bandwidth	~300MB/day		N/A
Signal Processing	Sampling Rate	1MHz		N/A
	Data Points/Second	4M		N/A
	Processor	1GHz ARM		N/A
Power Consumption		< 5W, 0.1A		N/A
NEMA Type (Hub)		IPX0	IPX0	N/A
Environmental Ratings	Temperature	32-140°F (0-60°C)		
	Elevation	< 6561 ft. (2,000m)		
Certification		cETLus, FCC Conforms to UL STD 61010-1; UL STD 61010-2-032; Certified to CSA STD C22.2 No. 61010-1; Conforms to CAN ICES-3(B)/NMB-3(B)	cETLus, FCC Conforms to UL STD 61010-1; UL STD 61010-2-032; Certified to CSA STD C22.2 No. 61010-1; Conforms to CAN ICES-3(B)/NMB-3(B)	cETLus, FCC Conforms to UL STD 61010-1; UL STD 61010-2-032; Certified to CSA STD C22.2 No. 61010-1; Conforms to CAN ICES-3(B)/NMB-3(B)
RoHS Compliant?		Y	Y	Y
Mechanical Specs	W x H x D (mm)	137 x 66 x 32	137 x 66 x 32	85.73 x 50.8 x 19.05
	W x H x D (in)	5.4" x 2.6" x 1.3"	5.4" x 2.6" x 1.3"	3.375" x 2" x .75"

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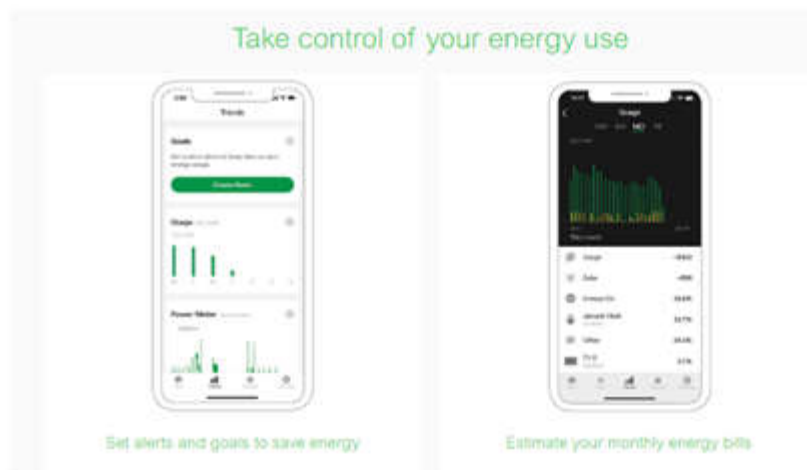
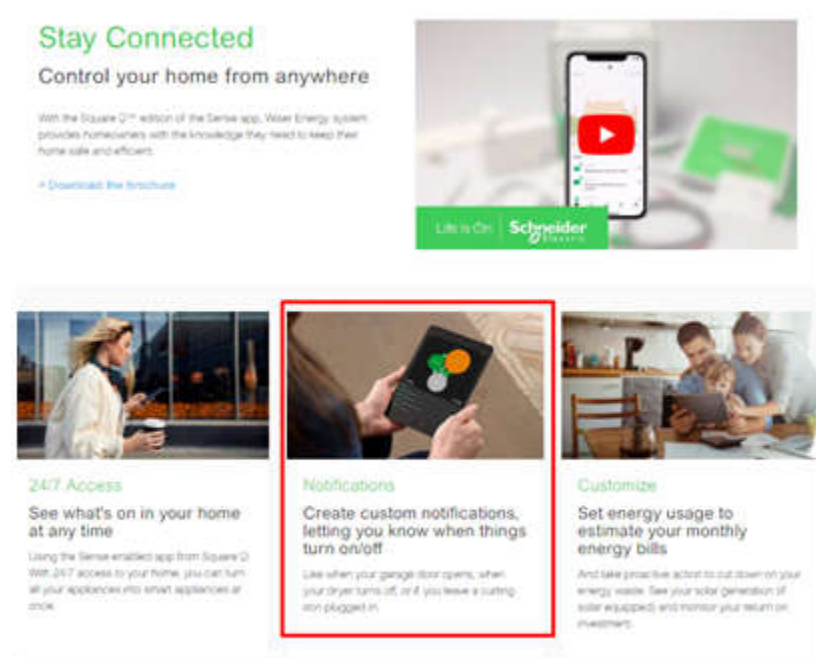Source: https://apps.apple.com/us/app/sense-home-energy-monitor/id1024626982?mt=8&ign-mpt=uo%3D4

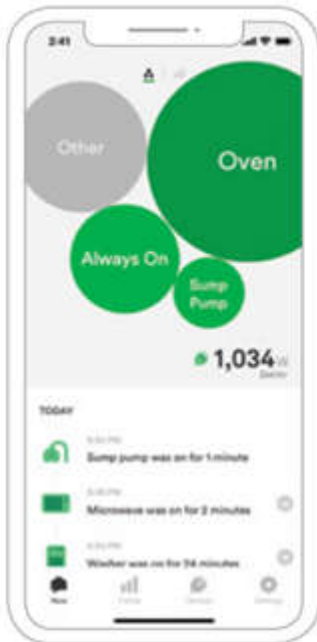Source: https://play.google.com/store/apps/details?id=com.sense.androidclient

Keep tabs on your home and take comfort into your own hands

See what's on in your home 24/7

Create custom notifications

Source: https://www.se.com/us/en/home/smart-home/wiser/wiser-app/

Take control of your energy use

Set alerts and goals to save energy

Estimate your monthly energy bills

Source: Source: https://www.se.com/us/en/home/smart-home/wiser/wiser-app/

22.   The infringing products provide a comparison means for comparing said count value with a threshold value and generating from the comparison a status signal, said status signal having two possible values which thereby indicates whether the count value is greater than or less than said threshold value. For example, the monitor integrates with Sense mobile application ("Sense Home Energy Monitor") to generate a count value corresponding to at least one of the sensor (such as current sensor) and transmit via a wireless communication network (such as Wi-Fi). Further, the monitor compares the count value with a threshold value which generates a status signal (such as alert, notification and/or alarm). The status signal having at least two possible values (high or low), greater than or less than the threshold value is indicated

on the mobile application. Certain aspects of this element are illustrated in the screenshots below

and/or in those provided in connection with other allegations herein.
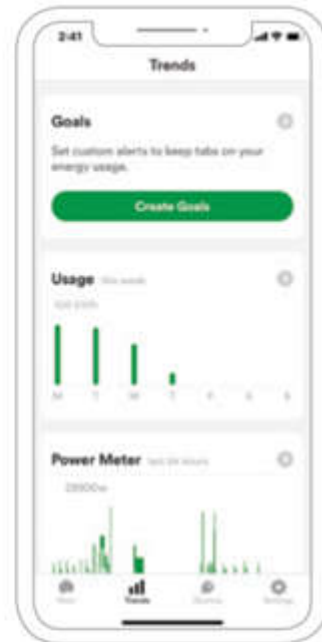

Source: https://www.se.com/us/en/home/smart-home/wiser/wiser-app/

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Source: https://download.schneider-electric.com/files?p_enDocType=Brochure&p_File_Name=0102BR1901.pdf&p_Doc_Ref=0102BR1901 , Page 7

Energy Management

There's no reason your home's electrical bill should be a mystery. **Gain a little insight to manage your energy better** and keep the household budget on track.

With the Wiser Energy system you will see where your money goes and easily spot the inefficiencies that increase your expenses. **The Wiser Energy system will help you take advantage of cheaper, off-peak energy** and make the most of your solar power installation.

Is home safety your main concern? The Wiser Energy system detects electrical use and sends you notifications via the app, like when your garage door opens, or when you leave a curling iron plugged in.

A growing list of smart device integrations including **Philips Hue, Wemo Insight and Kasa smartplugs** enable the ability to take action directly within the app.

See energy usage trends and create goals with the intuitive, easy to use app

Control certain connected devices easily from anywhere at anytime

Source: https://download.schneider-electric.com/files?p_enDocType=Brochure&p_File_Name=0102BR1901.pdf&p_Doc_Ref=0102BR1901 Page 8
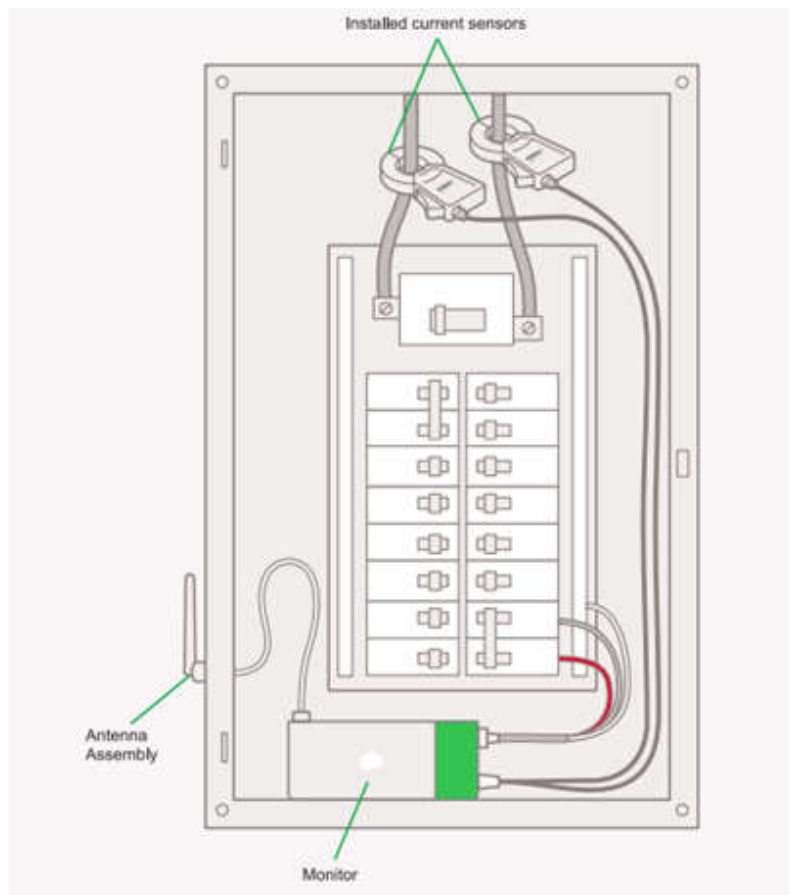
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Create custom notifications

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Set alerts and goals to save energy

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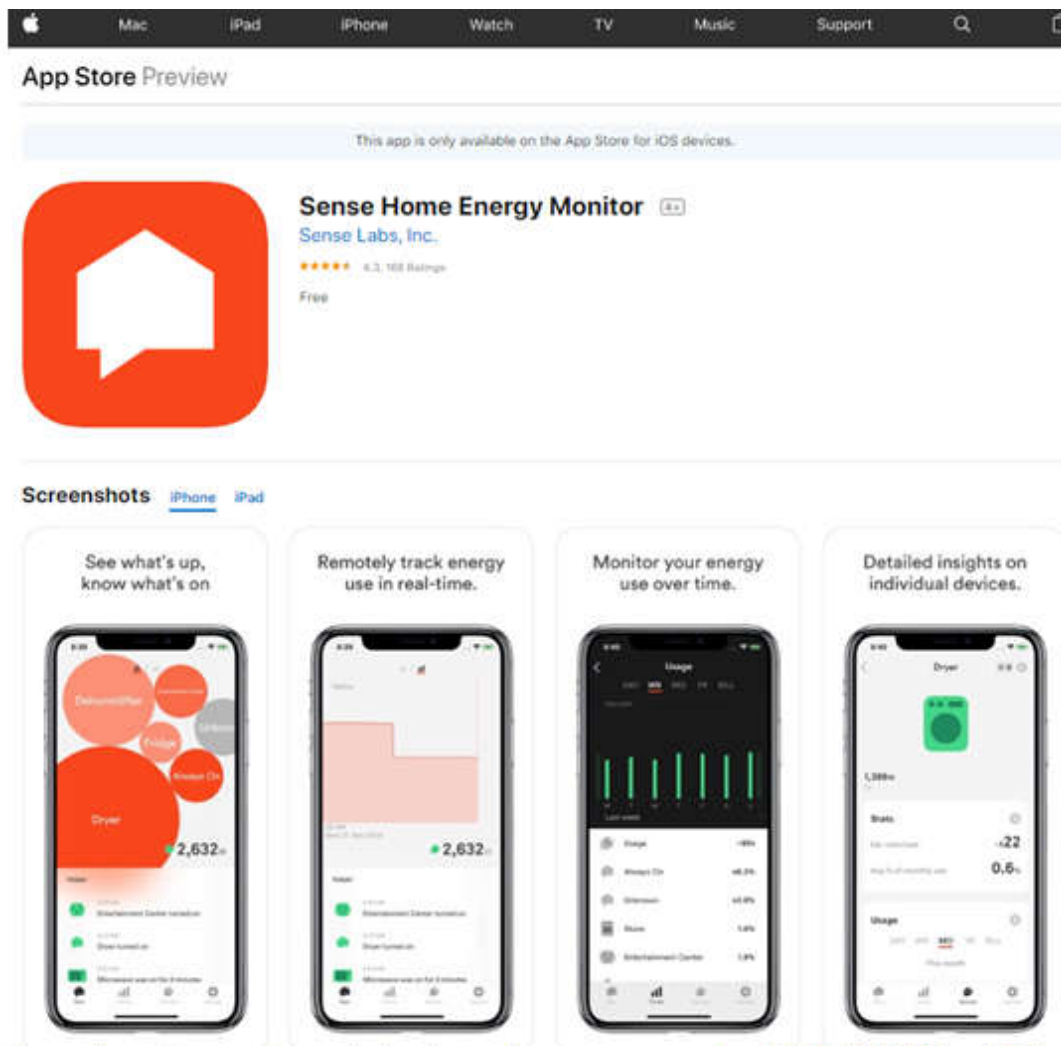
23.   The infringing products provide a transmission means for transmitting said status signal via a communications network to a display. For example, the Wiser Energy System comprises an antenna assembly ("transmission means") connected to the monitor to transmit status signal corresponding to at least one of the sensor (such as current sensor) via a wireless network (such as Wi-Fi and/or Bluetooth). The Sense mobile application ("Sense Home Energy Monitor") runs on devices (such as mobiles, tablets, PCs) with display. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.
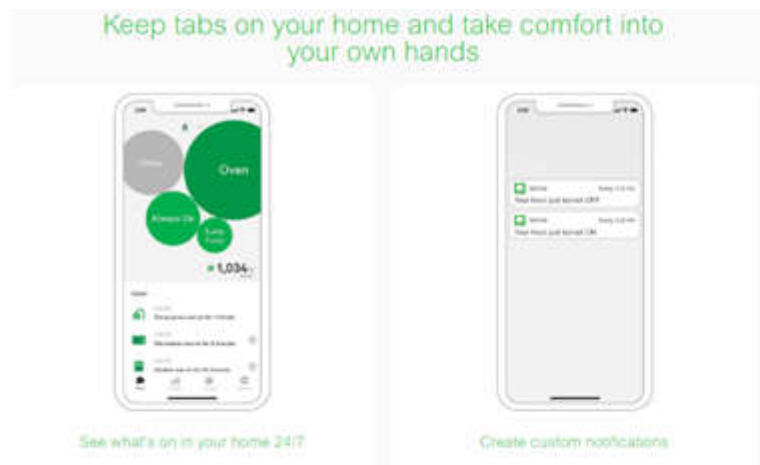
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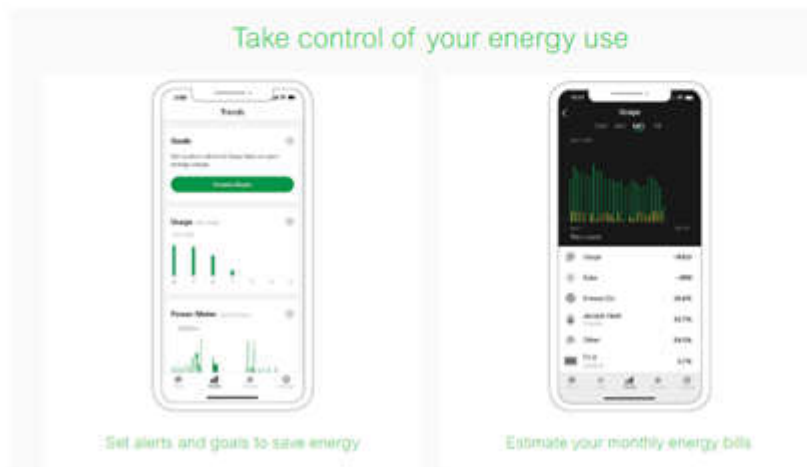
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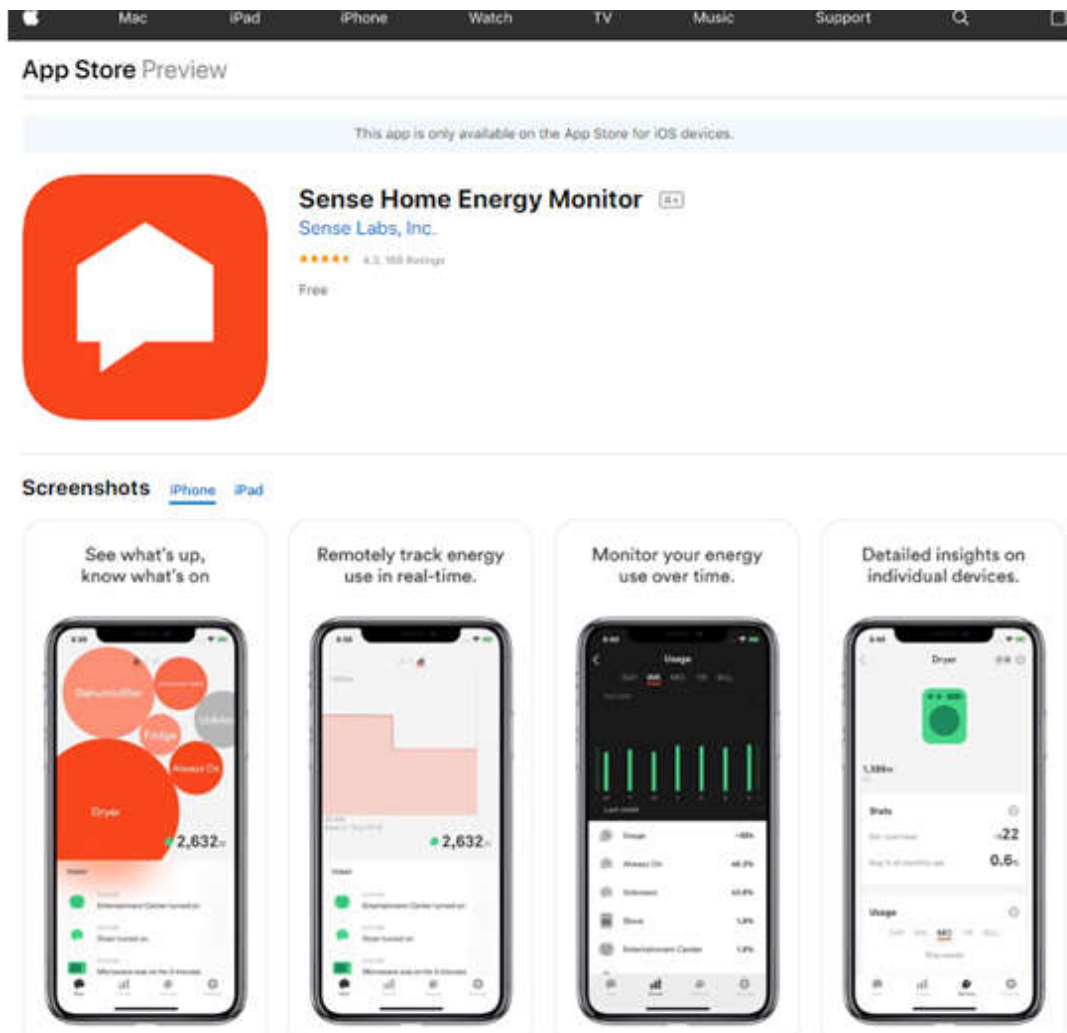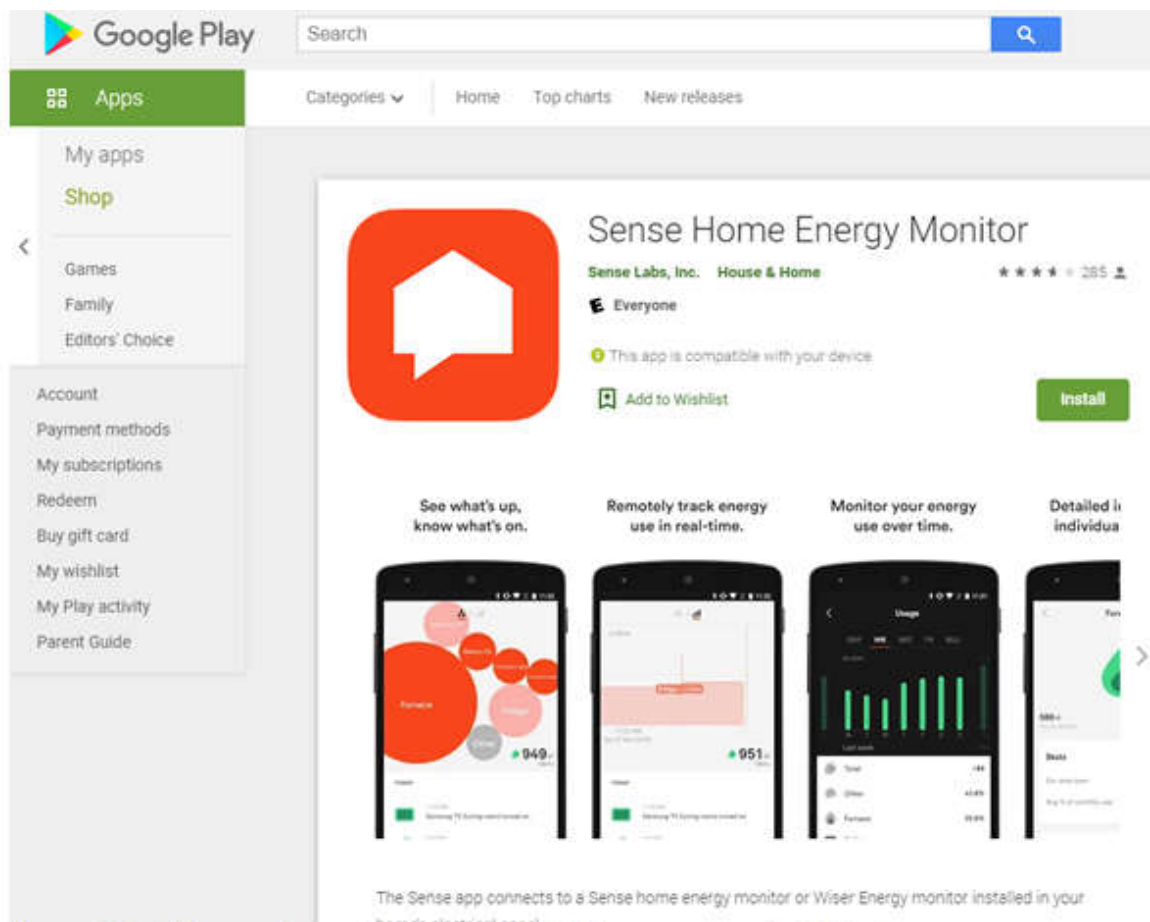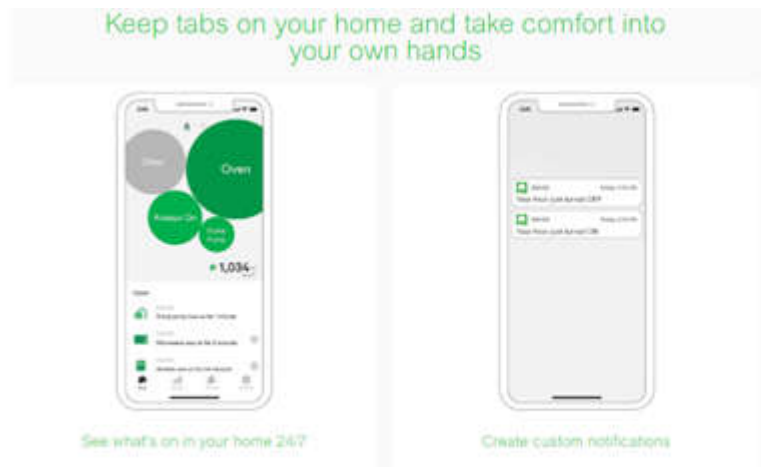| Catalog Number		WISEREM	WISEREMPV	WISERCTPV
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	Inside Diameter	1"		
Wireless	Wifi	802.11b/g/n Wi-Fi		N/A
	Bluetooth	Y		N/A
	Bandwidth	~300MB/day		N/A
Signal Processing	Sampling Rate	1MHz		N/A
	Data Points/Second	4M		N/A
	Processor	1GHz ARM		N/A
Power Consumption		< 5W, 0.1A		N/A
NEMA Type (Hub)		IPX0	IPX0	N/A
Environmental Ratings	Temperature	32-140°F (0-60°C)		
	Elevation	< 6561 ft. (2,000m)		
Certification		cETLus, FCC Conforms to UL STD 61010-1; UL STD 61010-2-032; Certified to CSA STD C22.2 No. 61010-1; Conforms to CAN ICES-3(B)/NMB-3(B)	cETLus, FCC Conforms to UL STD 61010-1; UL STD 61010-2-032; Certified to CSA STD C22.2 No. 61010-1; Conforms to CAN ICES-3(B)/NMB-3(B)	cETLus, FCC Conforms to UL STD 61010-1; UL STD 61010-2-032; Certified to CSA STD C22.2 No. 61010-1; Conforms to CAN ICES-3(B)/NMB-3(B)
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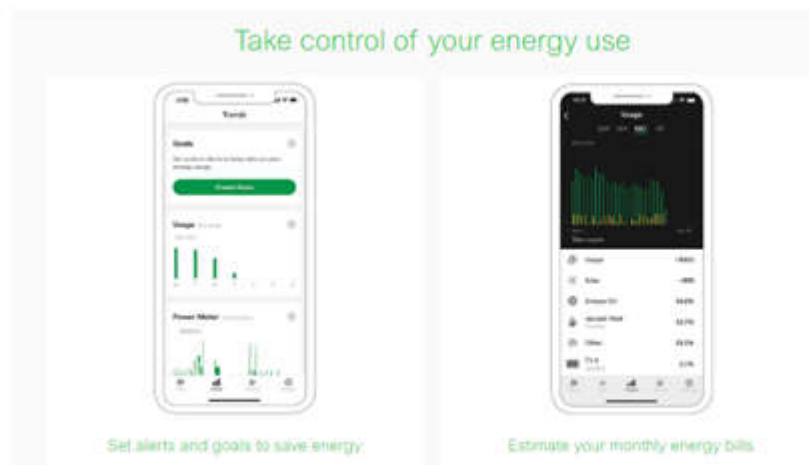
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Source: https://play.google.com/store/apps/details?id=com.sense.androidclient

Keep tabs on your home and take comfort into your own hands

See what's on in your home 24/7   Create custom notifications

Source: https://www.se.com/us/en/home/smart-home/wiser/wiser-app/

Take control of your energy use

Set alerts and goals to save energy   Estimate your monthly energy bills

Source: Source: https://www.se.com/us/en/home/smart-home/wiser/wiser-app/

24.   The infringing products provide a display means for displaying an indication of said assigned status. For example, the Wiser Energy System comprises Sense mobile application ("Sense Home Energy Monitor") to display an indication (such as alarm, notification and/or alerts) of at least one of the coupled sensor (such as current sensor). The application runs on devices (such as mobiles, tablets, PCs) comprising a display to show indication of assigned status. Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

Source: https://download.schneider-electric.com/files?p_enDocType=Instruction+sheet&p_File_Name=Wiser+Energy+Standard+Instruction+Bulletin.pdf&p_Doc_Ref=MFR39166_Standard_Wiser , Page 3

24/7 access

See what's on in your home at any time, from anywhere. With 24/7 access to your home, you can turn your appliances into smart appliances at once.

Notifications

Create custom notifications, letting you know when things turn on/off. Like when your garage door opens, when your dryer turns off, or if you leave a curling iron plugged in.

Customize

Set energy usage goals, estimate your monthly energy bills, and take proactive action to cut down on your energy waste. If your home is solar equipped, you can view solar generation, and monitor your return on investment.

Source: https://download.schneider-electric.com/files?p_enDocType=Brochure&p_File_Name=0102BR1901.pdf&p_Doc_Ref=0102BR1901 ,
Page 7

Source: https://www.se.com/us/en/home/smart-home/wiser/wiser-app/

25.   Details of infringement by the infringing products are provided in the claim chart attached as Exhibit B.

26.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

27.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

28.   Plaintiff is in compliance with 35 U.S.C. § 287.

COUNT II

(INFRINGEMENT OF UNITED STATES PATENT NO. 7,834,744)

29.   Plaintiff incorporates paragraphs 1 through 28 herein by reference.

30.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

31.   Plaintiff is the owner by assignment of the '744 Patent with sole rights to enforce the '744 Patent and sue infringers.

32.   A copy of the '744 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit C.

33.   The '744 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

34.   The claims of the '744 recite subject matter that is similar to that recited in the claims of the '683 Patent (discussed above in connection with Count I). The specification of the '744 Patent discloses problems of prior systems and non-generic solutions in a manner similar to the specification of the '683 Patent (discussed above in connection with Count I).

35.   The components recited in the claims (such as in claim 1 for example) are configured, such that they operate in a non-conventional manner.

36.   The components recited in the claims (such as in claim 1 for example) are configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit). Generic processors cannot provide this functionality. The '744 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

37.   Collectively, the claimed embodiments in the '744 Patent provide new solutions to problems of traditional security monitoring systems. These solutions are enabled by non-

generic components functioning in a non-conventional manner.

38.   The '744 Patent solves a problem with the art that is rooted in computer technology. The '744 Patent does not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.

39.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '744 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems covered by one or more claims of the '744 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services.   Defendant has infringed and continues to infringe the '744 Patent directly in violation of 35 U.S.C. § 271.

40.   Regarding Claim 1, Defendant makes, uses, sells and/or offers for sale an apparatus for monitoring a circuit and for coupling to a central system. For example, Schneider Electric provides Wiser Energy System comprising a current sensor, antenna, monitor and Sense mobile application ("Sense Home Energy Monitor") which performs a real-time energy monitoring of residential electrical system. A monitor is used for monitoring a measurable parameter (such as current and/or voltage) of an electrical circuit associated with the sensor. Infringing products and certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

41.   Details of infringement by the infringing products are provided in the claim chart attached as Exhibit D.

42.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

43.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

44.   Plaintiff is in compliance with 35 U.S.C. § 287.

COUNT III
(INFRINGEMENT OF UNITED STATES PATENT NO. 8,816,869)

45.   Plaintiff incorporates paragraphs 1 through 44 herein by reference.

46.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

47.   Plaintiff is the owner by assignment of the '869 Patent with sole rights to enforce the '869 Patent and sue infringers.

48.   A copy of the '869 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit E.

49.   The '869 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

50.   The claims of the '869 recite subject matter that is similar to that recited in the claims of the '683 Patent (discussed above in connection with Count I). The specification of the '869 Patent discloses problems of prior systems and non-generic solutions in a manner similar to the specification of the '683 Patent (discussed above in connection with Count I).

51.   The components recited in the claims (such as in claim 1 for example) are configured, such that they operate in a non-conventional manner.

52.   The components recited in the claims (such as in claim 1 for example) are configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit). Generic processors cannot provide this

functionality. The '869 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

53.   Collectively, the claimed embodiments in the '869 Patent provide new solutions to problems of traditional security monitoring systems. These solutions are enabled by non-generic components functioning in a non-conventional manner.

54.   The '869 Patent solves a problem with the art that is rooted in computer technology. The '869 Patent does not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.

55.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '869 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems covered by one or more claims of the '869 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed and continues to infringe the '869 Patent directly in violation of 35 U.S.C. § 271.

56.   Regarding Claim 1, Defendant makes, uses, sells and/or offers for sale a device for monitoring the status of a circuit based on a measurable parameter of the circuit. For example, Schneider Electric provides Wiser Energy System comprising a current sensor, antenna, monitor and Sense mobile application ("Sense Home Energy Monitor") which performs a real-time energy monitoring of residential electrical system. A monitor is used for monitoring a measurable parameter (such as current and/or voltage) of an electrical circuit associated with the sensor. Infringing products and certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

57.   Details of infringement by the infringing products are provided in the claim chart attached as Exhibit F.

58.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

59.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

60.   Plaintiff is in compliance with 35 U.S.C. § 287.

COUNT IV
(INFRINGEMENT OF UNITED STATES PATENT NO. 8,912,893)

61.   Plaintiff incorporates paragraphs 1 through 60 herein by reference.

62.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

63.   Plaintiff is the owner by assignment of the '893 Patent with sole rights to enforce the '893 Patent and sue infringers.

64.   A copy of the '893 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit G.

65.   The '893 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

66.   The claims of the '893 recite subject matter that is similar to that recited in the claims of the '683 Patent (discussed above in connection with Count I). The specification of the '893 Patent discloses problems of prior systems and non-generic solutions in a manner similar to the specification of the '683 Patent (discussed above in connection with Count I).

67.   The components recited in the claims (such as in claim 1 for example) are

configured, such that they operate in a non-conventional manner.

68.   The components recited in the claims (such as in claim 1 for example) are configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit). Generic processors cannot provide this functionality. The '893 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

69.   Collectively, the claimed embodiments in the '893 Patent provide new solutions to problems of traditional security monitoring systems. These solutions are enabled by non-generic components functioning in a non-conventional manner.

70.   The '893 Patent solves a problem with the art that is rooted in computer technology. The '893 Patent does not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.

71.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '893 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems covered by one or more claims of the '893 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed and continues to infringe the '893 Patent directly in violation of 35 U.S.C. § 271.

72.   Regarding Claim 1, Defendant makes, uses, sells and/or offers for sale a circuit monitoring device. For example, Schneider Electric provides Wiser Energy System comprising a current sensor, antenna, monitor and Sense mobile application ("Sense Home Energy Monitor") which performs a real-time energy monitoring of residential electrical

system. A monitor is used for monitoring a measurable parameter (such as current and/or voltage) of an electrical circuit associated with the sensor. Infringing products and certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

73.   Details of infringement by the infringing products are provided in the claim chart attached as Exhibit H.

74.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

75.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

76.   Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a)   Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b)   Award Plaintiff past and future damages, costs, and expenses resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(c)   Award Plaintiff pre-judgment and post-judgment interest and costs; and

(d)   Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: January 9, 2020   Respectfully submitted,

/s/ Jay Johnson

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ATTORNEYS FOR PLAINTIFF

EXHIBIT A

EXHIBIT B

EXHIBIT C

EXHIBIT D

EXHIBIT E

EXHIBIT F

EXHIBIT G

EXHIBIT H